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EXHIBIT C

-17-

**NOTICE OF MOTION AND MOTION TO COMPEL DEFENDANT WILLIAM K. SPENCER'S INITIAL
DISCLOSURES PURSUANT TO FED. RULE CIV. PROC., RULE 26; REQUEST FOR MONETARY
SANCTIONS IN THE AMOUNT OF \$1,365.00.00 AGAINST DEFENDANT WILLIAM K. SPENCER**

| | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Adam Toporoff SBN 298115 Nussbaum APC 27489 Agoura Road Suite 102 Agoura Hills, CA 91301 Tel. 818-660-1919 Fax. 818-864-3241 info@nussbaumapc.com | FOR COURT USE ONLY |
| <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Gwendolyn Nolan | |
| UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION | |
| In re: WILLIAM K. SPENCER, <div style="text-align: right;">Debtor(s).</div> | CASE NO.: 2:20-bk-10401-BB ADVERSARY NO.: 2:20-ap-01103-BB CHAPTER: 7 |
| GWENDOLYN NOLAN <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: center;">vs.</div> WILLIAM K. SPENCER <div style="text-align: right;">Defendant(s).</div> | <div style="text-align: center;"> JOINT STATUS REPORT [LBR 7016-1(a)(2)] </div> <div style="padding-top: 10px;"> DATE: 06/30/2020 TIME: 2:00 p.m. COURTROOM: 1539 ADDRESS: 255 E. Temple St. Los Angeles, CA 90012 </div> |

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | |
|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

NO

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (or on attached page):
Plaintiff has provided Defendant with rule 26 initial disclosures, but Defendant has not yet provided Plaintiff with rule 26 initial disclosures. Defendant is preparing them currently.

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?
Plaintiff By 12/31/2020 Defendant By February 28, 2021 MAY 11 2021
2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.
Plaintiff Due to Covid 19 delays Defendant Due to Covid 19 delays SAME
3. When do you expect to complete your discovery efforts?
Plaintiff By 9/31/2020 Defendant Defendant does not plan to do discovery SAME
4. What additional discovery do you require to prepare for trial?
Plaintiff Written discovery and depositions Defendant Defendant does not plan to do discovery SAME

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (including rebuttal stage if applicable)?
Plaintiff 1-2 days Defendant 1-2 days SAME
2. How many witnesses do you intend to call at trial (including opposing parties)?
Plaintiff 2-3 Defendant 2 SAME

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3. How many exhibits do you anticipate using at trial?

Approximately 10

Plaintiff

1-2

Defendant

SAME

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☒ is ☐ is not requested
Reasons:

Defendant

Pretrial conference ☒ is ☐ is not requested
Reasons:

SAME

Plaintiff

Pretrial conference should be set after:
(date) 12/01/2020

Defendant

Pretrial conference should be set after:
(date) 12/01/2020

APRIL
1
2021

E. SETTLEMENT:

1. What is the status of settlement efforts?

Ongoing

2. Has this dispute been formally mediated? ☒ Yes ☐ No
If so, when?
The parties arbitrated the dispute.

3. Do you want this matter sent to mediation at this time?

Plaintiff

☐ Yes ☒ No

Defendant

☐ Yes ☒ No

SAME

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant

☐ I do consent

☒ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

SAME

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)

Respectfully submitted,

Date: 06/12/2020

Nussbaum APC

Printed name of law firm

Signature

Adam Toporoff

Printed name

Attorney for: Gwendolyn Nolan

Date: 6/14/2020

WILLIAM K. SPENCER

Printed name of law firm

Signature

William K. Spencer

Printed name

Attorney for: _____

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.



Ivan Lopez <skyblueprint9@gmail.com>

Fwd: D19LA24384. 59fh Place

1 message

William Spencer <wksarch@gmail.com>
To: Ivan Lopez <skyblueprint9@gmail.com>

Tue, Oct 6, 2020 at 6:45 AM

One copy

WKS

Begin forwarded message:

From: Shine Lin <shine.lin@lacity.org>
Date: September 16, 2020 at 8:34:24 AM PDT
To: William Spencer <wksarch@gmail.com>
Subject: Re: D19LA24384. 59fh Place

Hi William,

You provided 3' in front of the toilet which is fine.

However the door in the regular restrooms need to comply with the door maneuvering clearance which required door at both side with 42" and 18" striking edge. I do not see the door maneuvering clearance for both bathrooms. Ref 1134A.2 Option 2 last sentence. Please check item 9 and 10.

Sincerely,

Shine

On Tue, Sep 15, 2020 at 8:41 AM William Spencer <wksarch@gmail.com> wrote:

Your last 2 items

Sent from my iPhone

Begin forwarded message:

From: Valley Reprographics <info@valleyreprographics.com>
Date: September 14, 2020 at 11:33:46 AM PDT
To: William Spencer <wksarch@gmail.com>
Subject: scan

As requested



Richard Uss <richard@nussbaumapc.com>

Previously agreed to joint status report

1 message

William Spencer <wksarch@gmail.com>
To: richard@nussbaumapc.com

Sun, Jan 24, 2021 at 2:16 PM

Please revise

Sent from my iPhone

Begin forwarded message:

From: Staples Print & Marketing Services <Ccreg03@staplesbusinesscenter.com>
Date: January 24, 2021 at 1:09:47 PM PST
To: "wksarch@gmail.com" <wksarch@gmail.com>
Subject: Scan from Staples

Please find the scanned documents from Staples attached to this email. -Staples Print and Marketing Services

 **staples_scan.pdf**
146K